REMARKS

Claims 1-18, 20-29, and 32 are pending and at issue. Of these claims 1, 11, 18, 20, and 29 are independent. Claims 19, 30, and 31 are canceled.

Applicants respectfully traverse the rejection of claims 1-5, 7-15, 17, 18, 20-25, 27-29, and 32 as anticipated by Broadhurst et al., U.S. Patent No. 6,205,480 ("Broadhurst") and respectfully traverse the rejection of claims 6, 16, and 26 as obvious over Broadhurst in view of Brezak, Jr. et al., U.S. Patent No. 6,427,209 ("Brezak").

Each of the pending claims now recites a system or a method wherein security information is collected from a user contemporaneously with the initiation of a function and wherein the execution of the function is determined based on the collected security information. Neither Broadhurst nor Brezak discloses the collection of security information from a user contemporaneously with the initiation of a function in order to determine whether the function may be executed. As a result, neither Broadhurst nor Brezak can anticipate any of the pending claims. Furthermore, because no combination of Broadhurst and Brezak includes the element of collecting security information from a user contemporaneously with the initiation of a function or using this contemporaneously collected security information to determine whether the function may be executed, no combination of Broadhurst and Brezak can render any of the pending claims obvious.

While Broadhurst discloses a method and system for automatically authenticating a user to applications on a network, Broadhurst does not disclose the collection of security information from a user contemporaneously with the initiation of a function for determining whether the function may be executed. Instead, similar to other known systems, Broadhurst collects security information from a user prior to the attempted initiation of a function by a user. In particular, Broadhurst discloses a system in which a user authenticates himself first

(and only once) by inputting login ID and password information, which information is then

stored as a cookie. Thereafter, any subsequent need by other servers and server programs for

that login ID and password is satisfied by accessing the cookie. Unlike the method and

device of the pending claims, Broadhurst does not teach or disclose user interactive security

measures placed on the initiation of functions of a process control system. Specifically,

Broadhurst does not disclose the collection of security information from a user

contemporaneously with the initiation of a function for determining whether the function may

be executed.

As a result, Broadhurst, similar to other known systems, contains a security loophole

because, after a user logs on to a system terminal thereby completing the general system

authentication procedure, any other person may then use the system terminal to access

functions enabled by the logon procedure. The system and method of the pending claims, on

the other hand, prevents unauthorized execution of critical functions by requiring collection

of security information from the user contemporaneously with the initiation of the function

and then using the contemporaneously collected security information to determine whether

the function may be executed. Consequently, by using the claimed system, process critical

functions may be protected against unauthorized execution even after a general terminal

authentication process has been performed by an authorized user. Because Broadhurst

discloses an automated logon process that uses a single collection procedure for the collection

of authentication/authorization information for general access to the system, Broadhurst does

not disclose the collection of security information from a user contemporaneously with the

initiation of a function, as recited by the pending claims.

As discussed in the prior office action response, Brezak also fails to disclose

collecting security information from a user contemporaneously with the initiation of a

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function and using this security information to determine whether the function may be executed. Instead, Brezak discloses a computer terminal logon and network access authentication process that reduces the number of network requests necessary for network authentication and terminal logon. The Brezak system does not, however, tie this logon procedure to performing a function within a process control system. In fact, after the logon procedure is complete, the user may implement any desired function without entering any contemporaneous security information. Thus, similar to the known systems, Brezak only collects security information for a general logon process that may allow a user to access and execute logon-enabled functions anytime after authentication is successfully performed. Brezak does not disclose, in any way, the collection of security information contemporaneously with the initiation of a function in order to determine whether the function may be executed, as recited by the pending claims.

Moreover, neither Broadhurst nor Brezak teaches, in any manner, a security system that is used in a process control system. Broadhurst teaches a web-based, automated authorization scheme for simplifying authorization between multiple web servers that a user may access, which is not a process control system used to control, for example, a manufacturing process in a plant or a factory. Likewise, while Brezak discloses a computer terminal logon and network access authentication process that reduces the number of network requests necessary for network authentication and terminal logon, Brezak does not disclose or suggest the use of a security system in a process control system.

Because neither Broadhurst nor Brezak discloses the collection of security information from a user contemporaneously with the initiation of a function in order to determine whether the function may be executed, as recited by each of the pending claims, or
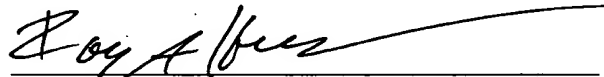
the use of a security system in a process control system, it follows that neither Broadhurst nor

Brezak can anticipate any of the pending claims.

Furthermore, Broadhurst and Brezak, either alone or in combination, cannot render

any of the pending claims obvious because neither Broadhurst nor Brezak provides any

motivation or suggestion to modify or combine their teachings to arrive at the claimed device

or system. In fact, both Broadhurst and Brezak teach away from the claimed invention.

Instead of teaching the collection of security information from a user contemporaneously

with the initiation of a function, Broadhurst and Brezak disclose an automated system where

the only security information collected from the user is collected once during an initial server

authentication process, not contemporaneously with the initiation of a function, as recited by

the claims. As discussed in the application and the prior office action response, such a

general terminal authentication process is not the function based authentication process

recited by the pending claims of the application. Therefore, no combination of Broadhurst

and Brezak can render any of the pending claims obvious.

CONCLUSION

Applicants have now made an earnest attempt to place this case in condition for immediate allowance. For the foregoing reasons and for other reasons clearly apparent, Applicants respectfully request reconsideration and allowance of claims 1-18, 20-29, and 32. If there are matters that can be discussed by telephone to further the prosecution of this application, Applicants respectfully request that the Examiner call its attorney at the number listed below.

Respectfully submitted,

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